

FILED

1 Hanna Rhee (Full Name)  
 2 912 Hazel St (Address Line 1)  
 3 Gridley, CA 95948 (Address Line 2)  
 4 530-456-6633, 714-321-1839 (Phone Number)

5 Plaintiff in Pro Per Black.Patients.Matter@gmail.com

2018 JUN -4 PM 12:26  
 CLERK U.S. DISTRICT COURT  
 CENTRAL DIST. OF CALIF.  
 SANTA ANA  
 BY *[Signature]*

8  
 9 **UNITED STATES DISTRICT COURT**  
 10 **CENTRAL DISTRICT OF CALIFORNIA**  
 11 **SACV18-00975 PA (JC)**

12 HANNA RHEE, ) Case No.: \_\_\_\_\_  
 13 Plaintiff, ) (To be supplied by the Clerk)  
 14 vs. )  
 15 MICHELLE ANNE BHOLAT, UCLA SCHOOL OF ) Civil Rights Complaint Pursuant to  
 16 MEDICINE FAMILY MEDICINE INTERNATIONAL ) 42 U.S.C. § 1983 (non-prisoners)  
 17 MEDICAL GRADUATE PROGRAM, ) Jury Trial Demanded:  Yes  No  
 18 UC REGENTS )  
 19 Defendant(s). )  
 20

(All paragraphs and pages must be numbered.)

21 **I. JURISDICTION**

22 1. This court has jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 1333.  
 23 Federal question jurisdiction arises pursuant to 42 U.S.C. § 1983.

25 **II. VENUE**

26 2. Venue is proper pursuant to 28 U.S.C. § 1331 because the Plaintiff works in  
 27 Southern California and greater than 50% of the Defendants reside in Los Angeles

### III. PARTIES

3. Plaintiff HANNA RHEE resides at:  
912 Hazel St  
Gridley, CA 95948

*(You should specifically identify each Defendant you intend to sue in a separate, numbered paragraph.)*

4. Defendant MICHELLE ANNE BHOLAT works at  
*(full name of Defendant)*

UCLA School of Medicine Family Medicine International Medical Graduate (IMG) Program  
*(Defendant's place of work)*

Defendant's title or position is Assoc. Professor and Vice-Chair Clinical Affairs Dept. of Family Medicine  
*(Defendant's title or position at place of work)*  
and Co-Director of IMG Program

This Defendant is sued in his/her (check one or both):

individual capacity       official capacity

This Defendant was acting under color of law because: as a member of the Medical Board of California, Co-Director of UCLA Dept of Medicine IMG Program, and Vice-Chair of Clinical Affairs in the Dept of Family Medicine, Defendant Bholat has consistently used her position to racially discriminate against non-white physicians such as the Plaintiff so as to favor white physicians within her UCLA Department as well as within the state of California. Her racism against non-white physicians such as Plaintiff has resulted in loss of work and revenue.

5. Defendant \_\_\_\_\_ Family Medicine IMG Program \_\_\_\_\_ works at \_\_\_\_\_  
(full name of Defendant)  
UCLA School of Medicine  
(Defendant's place of work)

Defendant's title or position is Family Medicine IMG Program  
*(Defendant's title or position at place of work)*

This Defendant is sued in his/her (check one or both):

individual capacity  official capacity

This Defendant was acting under color of law because: \_\_\_\_\_ as a Department Program entitled "International Medical Graduate" it consistently chooses candidates from non-African and non-Muslim countries so as to perpetuate their "whites only" discriminatory policy against physicians of color in the state of California. It has financially supported and trained Defendant Bholat into discriminating against non-white Physicians such as the Plaintiff.

1 6. Defendant University of California (UC) Regents works at  
2 *(full name of Defendant)*  
3 UC Regents  
4 *(Defendant's place of work)*  
5 Defendant's title or position is UC Regents  
6 *(Defendant's title or position at place of work)*

7 This Defendant is sued in his/her (check one or both):

8  individual capacity  official capacity

9 This Defendant was acting under color of law because as a state institution, it tolerated,  
10 supported, and funded the racist practices of Bholat's Family Medicine IMG Program by not  
11 only favoring white candidates into its IMG program, but also excluding an abnormally  
12 high number of Black medical students from its Residency program. In addition,

13  
14  
15  
16 1. Defendant NA works at  
17 *(full name of Defendant)*  
18 NA  
19 *(Defendant's place of work)*

20 Defendant's title or position is NA  
21 *(Defendant's title or position at place of work)*

22 This Defendant is sued in his/her (check one or both):

23  individual capacity  official capacity

24  
25 This Defendant was acting under color of law because NA  
26  
27  
28

#### **IV. STATEMENT OF FACTS**

*(Explain what happened in your own words. You do not have to cite legal authority in this section. Be specific about names, dates, and places. Explain what each Defendant did. Remember to number every paragraph.)*

1 On October 30, 2017, Defendant Bholat and the Medical Board of California  
2  
3  
4 *Insert ¶ #* (MBOC) filed an ISO (Interim Suspension Order) in state court to stop Plaintiff  
5  
6 from working immediately due to a mental disorder even though their paid medical  
7 “expert” concluded no mental illness. The ISO was denied.  
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On January 9, 2018 Defendant Bholat and the Medical Board of California (MBOC) filed an Accusation against the Plaintiff who is a federal whistleblower physician and former DEA informant who had repeatedly complained of unsafe Orchard Hospital conditions to MBOC and the California Department of Public Health.  
*Insert ¶ #*

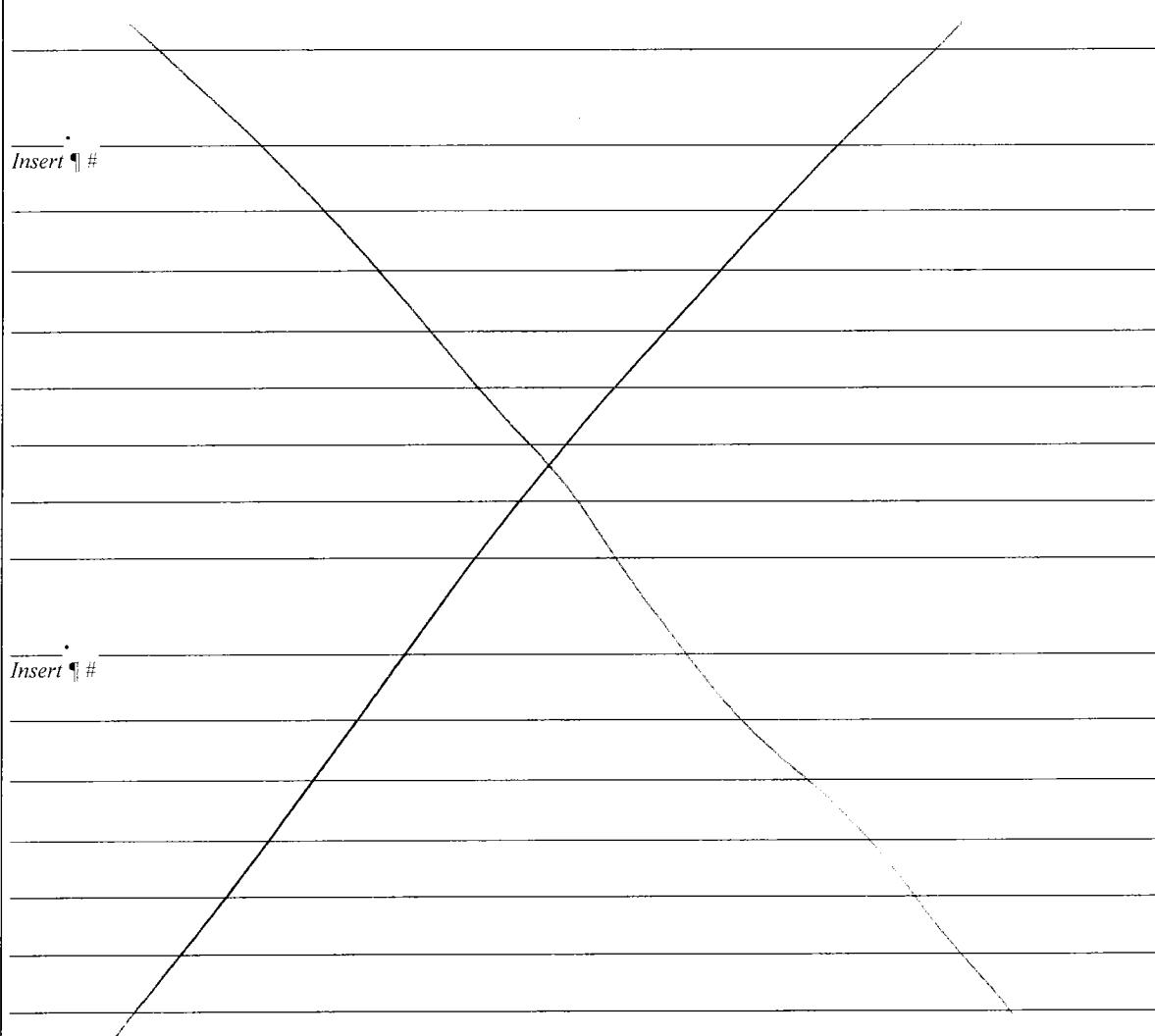
The Accusation was based on a racially biased failure of due process by Defendant Bholat favoring Hospital interests over Plaintiff, a small business owner.

Almost immediately after the Jan 9th filing, there was and continues to be a precipitous loss of business for the Plaintiff. As a result of the discriminatory practices of the state licensing Board against minority-owned small business owners such as the Plaintiff, on January 17, 2018 Plaintiff filed a federal civil rights lawsuit in the Eastern District of the US Court against Defendant Bholat, MBOC and others.

*Insert ¶ #* On April 6, 2018 Defendant Bholat and MBOC filed a Motion to Dismiss. In researching Plaintiff's response to their Motion, Plaintiff discovered on or about April 20, 2018 significant information regarding the funding and support for Defendant Bholat's discriminatory practices against physicians of color such as the Plaintiff. Defendant Bholat's racism against non-white physicians are funded and well supported by the UC Regents and UCLA School of Medicine (SOM) Family Medicine Department. Not only does Defendant Bholat disdain physicians of color, but she is trained to do so by the Family Medicine Department as there are

1. NO African-American staff physicians in the Department. In addition, there are  
2. *Insert ¶ #* absolutely NO civil right advocate staff physicians with affiliations to any non-profit  
3. groups of color such as Physician for Human Rights, United Muslim Medical  
4. Association, Association of Black Women Physicians, Black AIDS Institute,  
5. Black Women for Wellness, SURJ Los Angeles, Black Lives Matter, Martin Luther  
6. King Jr Poor People's Campaign, or even the National Medical Association.

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10. *Insert ¶ #*  
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19. *Insert ¶ #*  
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## V. CLAIMS

### Claim #1

1. Plaintiff realleges and incorporates by reference all of the paragraphs above.  
Insert ¶ #

2. Plaintiff has a claim under 42 U.S.C. §1983 for violation of the following   
Insert ¶# federal constitutional or statutory civil right:

## Right to work

3. The above civil right was violated by the following Defendants:

Insert ¶# Michelle Anne Bholat

UCLA School of Medicine Family Medicine IMG Program

UC Regents

*(You may list facts supporting your claim. Be specific about how each Defendant violated this particular civil right.)*

4 . Dr. Bholat violated Plaintiff's right to work by using her racist skill set she learned while working at UCLA

Family Medicine IMG to discriminate against Plaintiff when assessing her mental state by

stating Plaintiff had a mental illness when in fact Plaintiff was merely behaving as a person of her

racial and religious background would act and behave. This false allegation stated in the online

Accusation has resulted in Plaintiff's precipitous loss of work and revenue. UIC Regents are also

liable as they have funded the training and discriminatory practices for which Dr. Bholat has mastered.

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5. As a result of the Defendant's violation of the above civil right, Plaintiff   
Insert ¶# was harmed in the following way: The online Accusation filed by MROG was based on

false, racist statements without due process made by Defendant Bholat which almost immediately led to a precipitous drop in Plaintiff's work and revenue along with significant emotional distress.

## VI. REQUEST FOR RELIEF

WHEREFORE, the Plaintiff requests:

\$40 million or a lesser amount as determined by Jury to be donated equally to the following organizations:

Physicians for National Health Program, San Francisco CA

## First AME Church of Los Angeles

United Muslim Medical Association Community Clinic, Los Angeles CA

Association of Black Women Physicians, Inglewood CA

## Great Beginnings for Black Babies, Inglewood CA

Insert ¶ # Black AIDS Institute, Los Angeles, CA

California Black Women's Health Project, Inglewood CA

Black Women for Wellness, Los Angeles CA

SURJ Affiliate Los Angeles CA

## Black Lives Matter Los Angeles CA

---

Insert ¶# Student National Medical Association, Washington DC

## National Medical Association

California Legislative Black Caucus Youth Leadership Program

## 100 Black Men of Los Angeles

## Prison Fellowship

Insert ¶ #

Dated: 26/04/2018

Sign: 7/1/2004

Print Name: HANNA RHEE

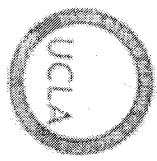
**DEMAND FOR JURY TRIAL**

Plaintiff hereby requests a jury trial on all issues raised in this complaint.

Dated: 06/03/2018

Sign: 21 May 10

Print Name: HANNA RHEE



David Geffen  
School of Medicine

International Medical Graduate (

An Innovative Approach

IMG Program Overview

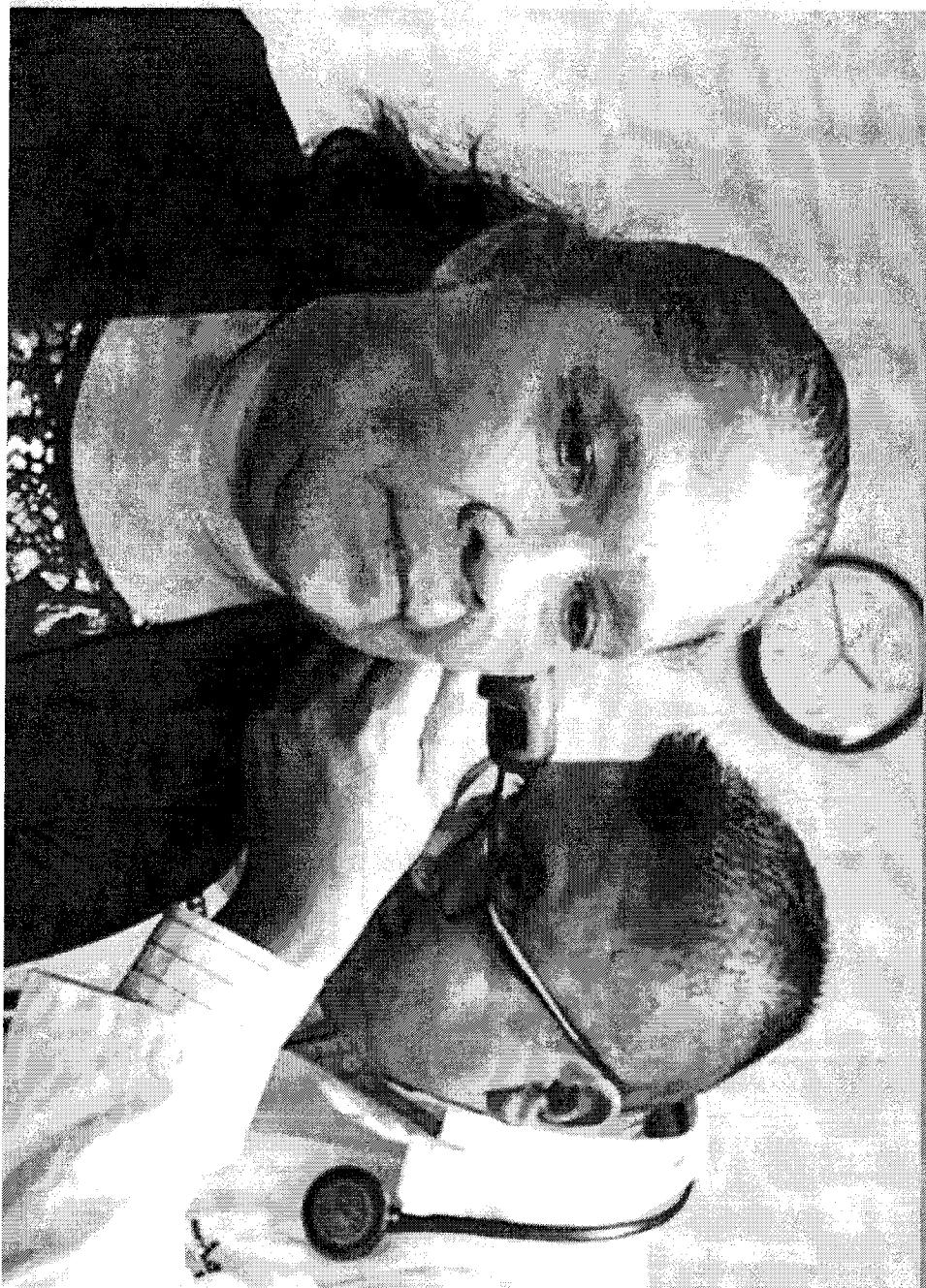
For the Applicant

Alumni

The Gap:

Primary care

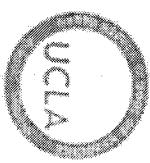
California's underserved  
populations.



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MG Program Overview

For the Applicant

Alumni

An Innovative Approach

International Medical Graduate (IMG)



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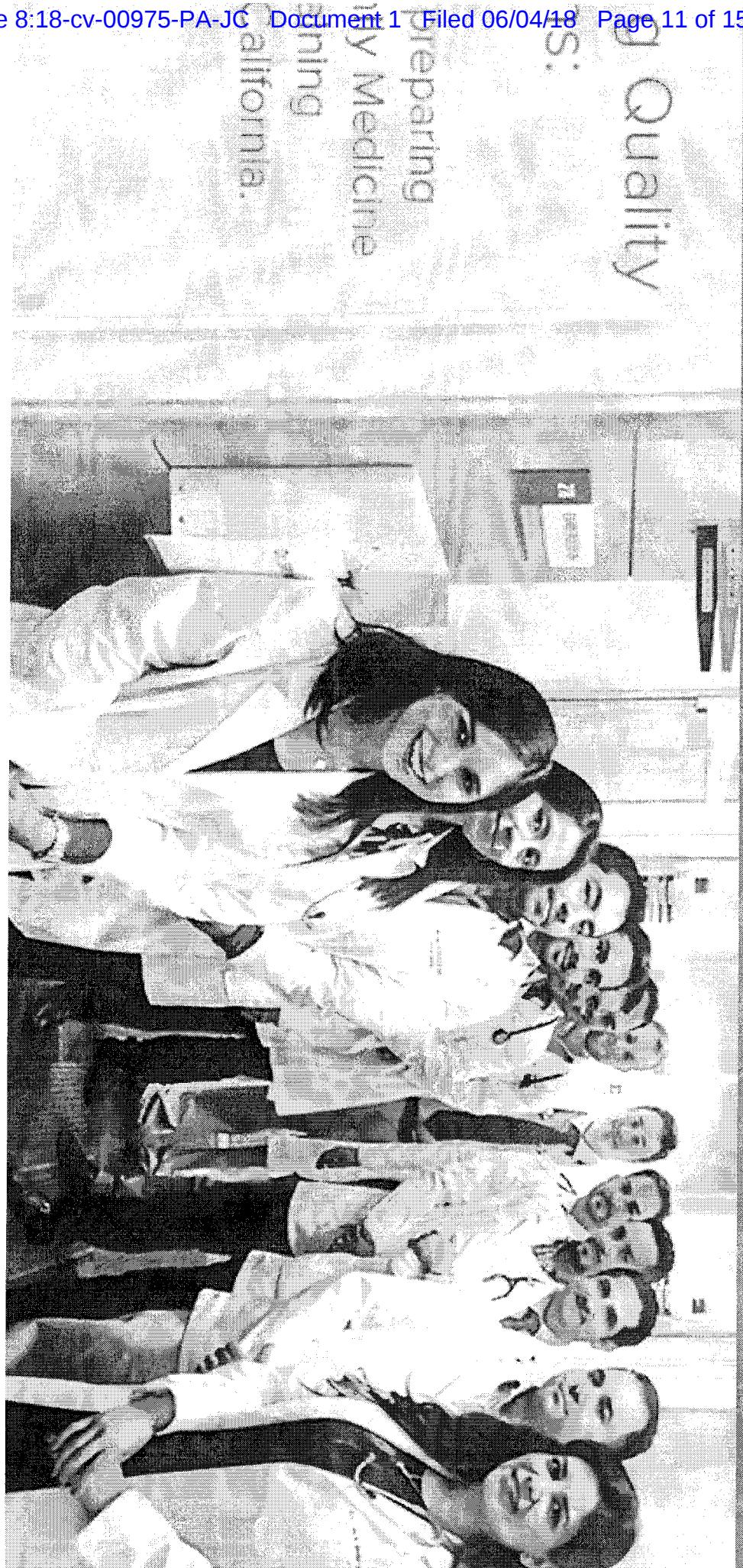
International Medical Graduate

Innovative Approach

MG Program Overview

For The Applicant

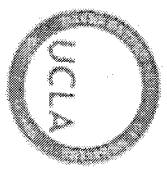
Alumni



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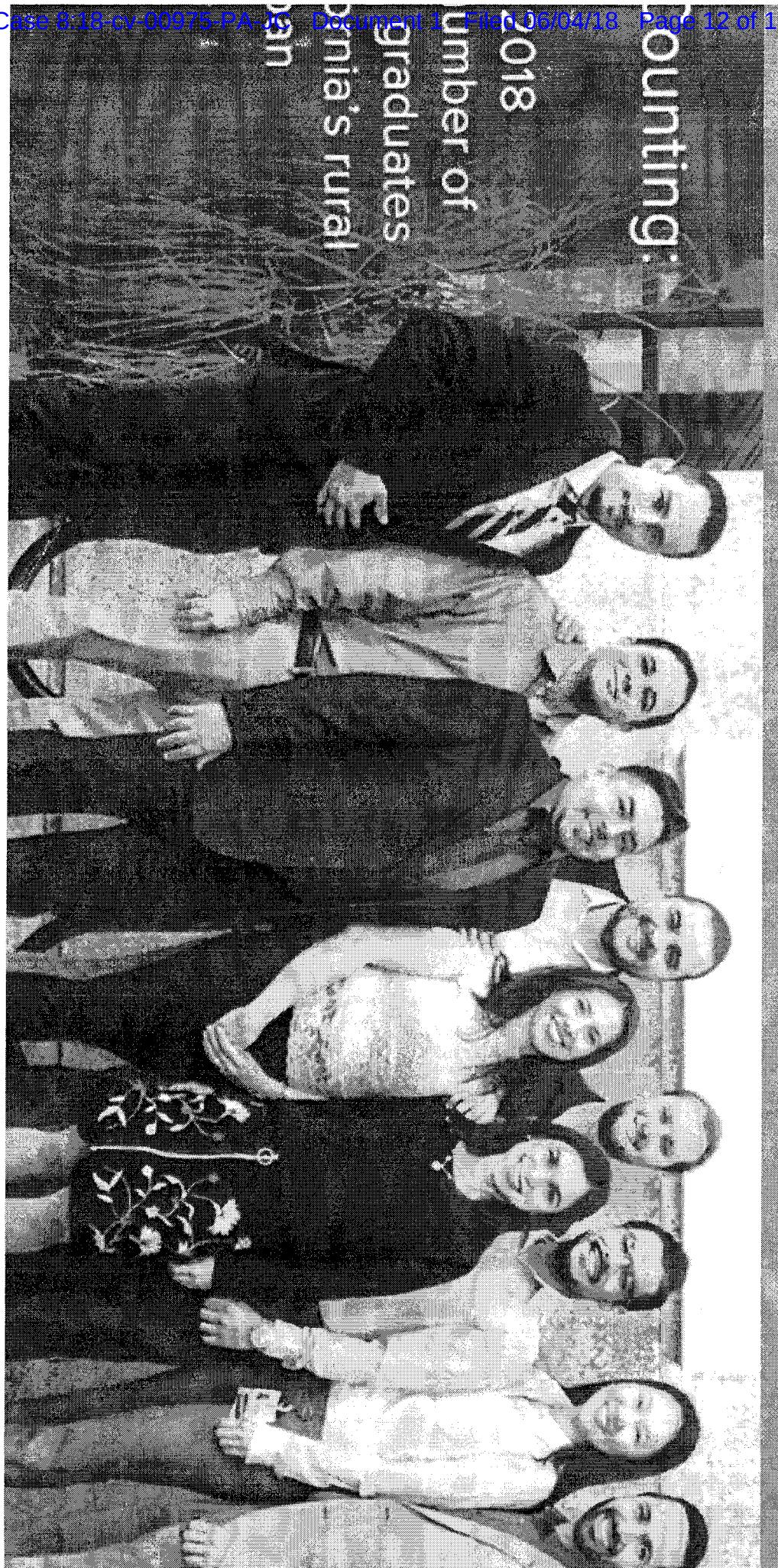
International Medical Graduate

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IMG Program Overview

For The Applicant

Alumni



Counting:  
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Take Note

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# UCLA Health



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## International Medical Graduate (IMG) Program

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An Innovative Approach | IMG Program Overview

For The Applicant

Alumni

## An Innovative Approach

### An Innovative Approach

Mobilizing the IMG

Tailored for California's Growing

Hispanic Population

Competency-Based Pre-Residency

Training: The IMG Model

A Contractual Commitment to Serve

Bilingual Bicultural

Proof of Concept

Legislative Support

### Legislative Support

Legislative Support: Building on Existing Programs



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## International Medical Graduate (IMG) Program

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IMG Program Overview

For The Applicant

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## For The Applicant

### For The Applicant

Eligibility Criteria

Application Form

Application Deadlines and Process

Selection Criteria

FAQs

Eligible applicants for the UCLA IMG Program must meet the following minimum criteria to be considered for admission:

- 1 U.S. Citizenship, Permanent Resident status, or Permanent Refugee status
- 2 Fluency (written and oral) in both Spanish and English
- 3 Bicultural competency in U.S. American and Latin American cultures
- 4 Graduate of a medical school recognized by the Medical Board of California
- 5 Graduated from medical school or completed a non-U.S. residency no more than five years prior
- 6 Must be willing to commit to both a Family Residency program in California, and one that services an under-resourced community in the state

In addition, we give preference to the following criteria:

- 7 Educated in a Latin American country from early childhood through medical school
- 8 A demonstrated dedication to communities in need
- 9 Have the financial means to not work for a period of 3 to 21 months, depending on the level of entry to the program
- 10 A demonstrated interest in the biopsychosocial aspects of medical care

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